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January 4, 2023

VIA ECF

Hon. Kenneth M. Karas
United States District Court
United States Courthouse
300 Quarropas Street, Chambers 533
White Plains, New York 10601-4150

Re: *SEC v. Edward Bronson, et al.*, Case No. 12-cv-6421 (KMK)

Dear Judge Karas:

In order to comply with Your Honor's Individual Practices, I write respectfully to supplement my letter of yesterday requesting an adjournment of the SEC's TRO motion and to vacate the schedule for Mr. Bronson's motion to be released from incarceration.

The deadlines that we are seeking to be adjourned or alternatively vacated are as follows:

January 6, 2023: Current deadline for Mr. and Mrs. Bronson's opposition to the SEC's TRO motion and Mr. Bronson's motion seeking release from incarceration due.

January 13, 2023: Current deadline for the SEC's reply to the Bronsons' opposition to its motion and its opposition to Mr. Bronson's motion due.

January 20, 2023: Mr. Bronson's reply to the SEC's opposition to his motion due.

We have not requested specific adjourned dates for the SEC's motion in light of our contemplated motion to withdraw which is now being drafted and will be filed imminently. As indicated, we ask that the deadlines for the anticipated motion to release Mr. Bronson from incarceration be vacated so that new counsel can address that with the SEC.

There have been no prior requests made to adjourn or vacate these dates. The SEC consents to our request.

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I apologize for our oversight in not including this information in my letter of yesterday. By way of an explanation, but not an excuse, the circumstances were unusual and exigent.

Respectfully yours,

/s/ Judd Burstein

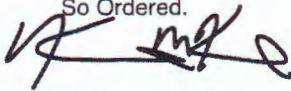
Judd Burstein

Encl.

cc: All Counsel of Record (via ECF w/ encl.)
Dawn Bronson (on behalf of herself and Edward Bronson) (via email w/ encl.)

Granted. The schedule for the Motion to Vacate the TRO is stayed until further order of the Court. The schedule related to the putative Motion to Release Mr. Bronson is vacated, pending a Motion to Withdraw from Mr. Burstein, who owes the Court no apology for the fluid nature of the briefing schedule in this case.

So Ordered.



1/4/23